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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual; DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATED REQUEST FOR
SETTLEMENT CONFERENCE**

(First Request)

1 GALUPPO, an individual; DENIS KOPITAS,
2 an individual; TERRY TSATAS, an individual;
3 PANAGIOTA TSATAS, an individual;
4 OURANIA TSATAS, an individual;
5 KIRIAKOS PRIMBAS, an individual;
6 EVANTHIA PRIMBAS, an individual;
7 PATRICK AYOUB, an individual; MICHAEL
8 BESCEC, an individual; ERNEST LEBOEUF,
9 an individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
individual; GIOVANNI MONCADA, an
individual; MARC RIEL, an individual;
JARADEH SALIM, an individual; HANI
HAMAM, an individual; CONSTANTIN
ZISSIS, an individual; BESSIE PEPPAS, an
individual; NIKI PALIOVRAKAS, an
individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a
13 Nevada Corporation; MICHAEL J. WARREN,
14 an individual; J. EDWARD DANIELS, an
15 individual; MARIUS DE MOS, an individual;
16 JASON DE MOS, an individual; ROBERT
17 BRUCE HARRIS, an individual; KELLY
KABILAFKAS, an individual; and
APCENTIVE, INC., a Nevada Corporation,

18 Defendants.
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STIPULATED REQUEST FOR SETTLEMENT CONFERENCE

Plaintiffs¹ and Defendants (as listed in the above caption, with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulated Request for Settlement Conference pursuant to LR 16-5 and page 2 of the Chambers Practices of The Honorable Richard F. Boulware, II², as well as LR IA 6-1 and LR IA 6-2.

WHEREAS, this is the Parties’ first request for Settlement Conference.

WHEREAS, on March 31, 2025, the Court issued its ruling on Plaintiffs’ Motion for Partial Summary Judgment and *Daubert* Motions. ECF No. 325.

WHEREAS, the Parties have engaged in preliminary settlement discussions since the Court’s March 31, 2025 Order.

WHEREAS, the Parties are currently required to submit an amended joint pretrial order by June 2, 2025 (ECF No. 325).

WHEREAS, the Parties wish to further explore the possibility of settlement and wish to narrow any issues for trial to the extent possible.

WHEREAS, the Parties would be available for a settlement conference as early as May 14, 2025, but are not available on the following dates for the remainder of May: May 20, 22, 23, 27, 28, 29, 30. In June, the Parties are available on all days except: June 4, 16, 18, 30.

WHEREAS, the Parties are agreeable to having counsel and the Parties appear remotely because counsel and the Parties are located in different states and countries.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by

¹ As listed in the above caption, with the exception of the ten named plaintiffs for whom the Court granted a Motion to Withdraw (ECF No. 219).

² “Generally, a case will be referred to the assigned Magistrate Judge for a settlement conference pursuant to Local Rule 16-5 after dispositive motions are fully briefed. In those cases, Judge Boulware will usually stay the ruling and provide the parties the opportunity to participate in the settlement conference before the dispositive motions are addressed. If no dispositive motions are filed, the case will generally be referred for a settlement conference as soon as the Joint Pretrial Order is filed. However, parties may file a written request for an early pretrial conference pursuant to Local Rule 16-2.”

and through their respective attorneys of record, that, for good cause and pursuant to LR 16-5 and page 2 of the Chambers Practices of The Honorable Richard F. Boulware, II, that this case is ordered to a settlement conference before a Magistrate on the soonest available date on the assigned Magistrate's calendar that the Parties and their counsel are all available. The deadline to submit an amended joint pretrial order is hereby stayed pending the outcome of the settlement conference.

IT IS SO STIPULATED.

DATED: May 13, 2025

Respectfully submitted.

By: /s/ Andrew B. Goodman
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DATED: May 13, 2025

Respectfully submitted.

By: s/ Peter L. Chasey
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*Attorneys for Defendants Airborne Wireless
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 Harris, Michael J. Warren, Jason de Mos,
 and Kelly Kabilafkas*

DATED: May 13, 2025

Respectfully submitted.

By: s/ Michael Tremonte
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IT IS SO ORDERED.

DATED this 14th day of May, 2025.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On May 13, 2025, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

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DATED May 13, 2025.

/s/ Amanda McGill
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